

From: [Griffo, Shannon](#)
To: [Duross, Jeanne](#); [Fugh, Justina](#)
Subject: RE: A follow-up question
Date: Monday, February 25, 2019 3:26:00 PM
Attachments: [image001.png](#)

(b) (5)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Let's ask Justina tomorrow.

I think

(b) (5)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Shannon Griffo
Ethics Attorney
Office of General Counsel, Ethics
U.S. Environmental Protection Agency
(202) 564-7061
Griffo.Shannon@epa.gov

From: Duross, Jeanne
Sent: Monday, February 25, 2019 12:28 PM
To: Fugh, Justina <Fugh.Justina@epa.gov>; Griffo, Shannon <Griffo.Shannon@epa.gov>
Subject: Fw: A follow-up question

(b) (5)

[REDACTED]


Jeanne M. Duross/ Ethics Attorney/Office of General Counsel, Ethics/U.S.
EPA/4407F--WJCN (Mail Code 2248A)/Phone (202)564-6595 

From: Hoverman, Taylor
Sent: Monday, February 25, 2019 12:16 PM
To: Duross, Jeanne
Subject: RE: A follow-up question

Jeanne,

Thank you. Does this mean I'm unable to attend any of AFPM's conferences or committee meetings as a speaker or any meetings that they schedule with the Agency on rulemakings? Just making sure I understand all of the restrictions. Thanks!

Taylor Hoverman

Policy Counsel to the Assistant Administrator
Office of Land and Emergency Management (OLEM)
United States Environmental Protection Agency
1301 Constitution Ave, NW
Washington, DC 20004
202-566-2705 

From: Duross, Jeanne
Sent: Monday, February 25, 2019 12:13 PM
To: Hoverman, Taylor <hoverman.taylor@epa.gov>
Subject: Re: A follow-up question

Hi Taylor,

Thanks so much for following up with this question. I ran it by Justina and Shannon to ensure that the advice given would be consistent with that given other similarly situated political appointees who signed the Pledge.

Here are the rules:

Unfortunately, because AFPM, your former employer, set up the meeting, you can't go at all. The specific party matter in which you cannot participate under the pledge is the invitation by the former employer for their meeting. For this specific party matter, it doesn't matter how many parties are invited or attending. What is significant is that it is AFPM's meeting. In addition, you also cannot participate in deciding whether Steven Cook should go or provide help with his presentation materials.

Please let me know if you have questions. We're very happy you spotted the issue and reached out for assistance.

Best,

Jeanne

Jeanne M. Duross/ Ethics Attorney/Office of General Counsel, Ethics/U.S.
EPA/4407F--WJCN (Mail Code 2248A)/Phone (202)564-6595

From: Hoverman, Taylor
Sent: Friday, February 22, 2019 3:18 PM
To: Duross, Jeanne
Subject: A follow-up question

Jeanne,

Thank you for meeting with me yesterday and walking through all of my specific ethics questions. I already have a follow-up question –

AFPM has invited Steven Cook to speak at a meeting in March and was interested in having me accompany him. There will be at least a dozen companies in the room in addition to AFPM staff. Is it permissible for me to attend since there are at least five (I think that's the threshold number) other companies in the room? Coming from a trade association, it's not clear to me whether the trade association's member companies count towards the threshold of having other companies present.

I also want to confirm that Shannon is planning to reach out to me to discuss potential recusals?

Thanks!

Taylor Hoverman

Policy Counsel to the Assistant Administrator
Office of Land and Emergency Management (OLEM)
United States Environmental Protection Agency
1301 Constitution Ave, NW
Washington, DC 20004
202-566-2705

From: [Hoverman, Taylor](#)
To: [Duross, Jeanne](#)
Cc: [Fugh, Justina](#); [Griffo, Shannon](#)
Subject: RE: A follow-up question
Date: Wednesday, February 27, 2019 9:56:26 AM
Attachments: [image001.png](#)

Good morning,

I should've printed this page to bring with me to our meeting – lesson learned! Thank you clearing this.

Taylor Hoverman

Policy Counsel to the Assistant Administrator
Office of Land and Emergency Management (OLEM)
United States Environmental Protection Agency
1301 Constitution Ave, NW
Washington, DC 20004
202-566-2705

From: Duross, Jeanne
Sent: Wednesday, February 27, 2019 9:37 AM
To: Hoverman, Taylor <hoverman.taylor@epa.gov>
Cc: Fugh, Justina <Fugh.Justina@epa.gov>; Griffo, Shannon <Griffo.Shannon@epa.gov>
Subject: RE: A follow-up question

Hi Taylor,

Thank you for forwarding the link. It was incredibly helpful, and this situation illustrates why forwarding invitations and gathering information is so important in getting an accurate ethics analysis!

This event is actually sponsored by the D.C. Energy & Environment Associations group, of which WEN is a member, and is co-sponsored by ELI. Hogan Lovells is providing the venue and catering. What is most important from an ethics perspective is that **the event is free and open to the public**. In order to attend, all one must do is register and anyone may register. The only restriction on attendance is the number of people the venue can hold.

In the gift rule, there are several exclusions from the definition of a "gift." One such exclusion is for "opportunities and benefits, including favorable rates and discounts, available to the public . . . whether or not restricted on the basis of geographic considerations." See 5 CFR 2635.204(b)(4).

What we have here is an opportunity to attend a networking event that is open to the public and fits the exclusion. Because the event is excluded from the definition of "gift," the lobbyist gift prohibition in the Pledge does not apply. You may attend the event.

-Jeanne

Ethics Attorney | Office of General Counsel | US EPA | Mail Code 2311A | Room 4407F North,
William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use
20004 for the zip code) | phone 202-564-6595| epa mobile 202-579-7848|fax 202-564-1772

From: Hoverman, Taylor
Sent: Tuesday, February 26, 2019 4:25 PM
To: Duross, Jeanne <Duross.Jeanne@epa.gov>
Subject: RE: A follow-up question

FYI – here is the link describing the networking event at Hogan Lovells I asked about:

<https://www.eli.org/events/dc-energy-environment-associations-reception>

Taylor Hoverman

Policy Counsel to the Assistant Administrator
Office of Land and Emergency Management (OLEM)
United States Environmental Protection Agency
1301 Constitution Ave, NW
Washington, DC 20004
202-566-2705

From: Hoverman, Taylor
Sent: Tuesday, February 26, 2019 9:29 AM
To: Duross, Jeanne <Duross.Jeanne@epa.gov>
Subject: RE: A follow-up question

OK – Thank you, Jeanne!

Taylor Hoverman

Policy Counsel to the Assistant Administrator
Office of Land and Emergency Management (OLEM)
United States Environmental Protection Agency
1301 Constitution Ave, NW
Washington, DC 20004
202-566-2705

From: Duross, Jeanne
Sent: Tuesday, February 26, 2019 9:28 AM
To: Hoverman, Taylor <hoverman.taylor@epa.gov>
Subject: FW: A follow-up question

Hi Taylor,

So as to not leave you hanging out there in the interim, here's a little bit more that we can say by way of guidance.

Regarding the specifics of the questions below, you can't speak in your official capacity at a conference sponsored (or co-sponsored) by your former employer.

OGC/Ethics would really need to know more about the specifics of other types of meetings before giving you correct answers and advice. Whether you can attend consistent with your Trump pledge obligations depends on the subject matter of the meeting and how many other attendees are present. An appointee may be permitted by OGC/Ethics to attend a meeting at which her former employer participates provided: OGC/Ethics first determines that the subject matter is a particular matter of general applicability; that there are more than 4 other individuals with no other recusal issues for the appointee in attendance; and the attendees represent a diversity of viewpoints.

When the former employer is the trade association, the question regarding a diversity of viewpoints needs to be evaluated on a case by case basis. It's a harder question than some other fact patterns present.

Hope this is helpful. As I mentioned, I'll be in touch again after our staff meeting.

Best,

Jeanne

Ethics Attorney | Office of General Counsel | US EPA | Mail Code 2311A | Room 4407F North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-6595| epa mobile 202-579-7848|fax 202-564-1772

From: Duross, Jeanne

Sent: Tuesday, February 26, 2019 9:22 AM

To: Hoverman, Taylor <hoverman.taylor@epa.gov>

Subject: RE: A follow-up question

Hi Taylor,

The answer regarding whether you may attend something is always going to be highly fact-specific in every instance. The best advice is to contact OGC/Ethics any and every time that you are contemplating any work or invitation that involves AFPM.

We have a staff meeting today and I am going to raise your question. I'll be in touch with any more specific guidelines that I can share and/or a request for you to meet with us briefly. Stay tuned.

-Jeanne

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William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use
20004 for the zip code) | phone 202-564-6595| epa mobile 202-579-7848|fax 202-564-1772

From: Hoverman, Taylor
Sent: Monday, February 25, 2019 12:17 PM
To: Duross, Jeanne <Duross.Jeanne@epa.gov>
Subject: RE: A follow-up question

Jeanne,

Thank you. Does this mean I'm unable to attend any of AFPM's conferences or committee meetings as a speaker or any meetings that they schedule with the Agency on rulemakings? Just making sure I understand all of the restrictions. Thanks!

Taylor Hoverman

Policy Counsel to the Assistant Administrator
Office of Land and Emergency Management (OLEM)
United States Environmental Protection Agency
1301 Constitution Ave, NW
Washington, DC 20004
202-566-2705

From: Duross, Jeanne
Sent: Monday, February 25, 2019 12:13 PM
To: Hoverman, Taylor <hoverman.taylor@epa.gov>
Subject: Re: A follow-up question

Hi Taylor,

Thanks so much for following up with this question. I ran it by Justina and Shannon to ensure that the advice given would be consistent with that given other similarly situated political appointees who signed the Pledge.

Here are the rules:


Unfortunately, because AFPM, your former employer, set up the meeting, you can't go at all. The specific party matter in which you cannot participate under the pledge is the invitation by the former employer for their meeting. For this specific party matter, it doesn't matter how many parties are invited or attending. What is significant is that it is AFPM's meeting. In addition, you also cannot participate in deciding whether Steven Cook should go or provide help with his presentation materials.

Please let me know if you have questions. We're very happy you spotted the issue and reached

out for assistance.

Best,

Jeanne

Jeanne M. Duross/ Ethics Attorney/Office of General Counsel, Ethics/U.S.
EPA/4407F--WJCN (Mail Code 2248A)/Phone (202)564-6595 

From: Hoverman, Taylor
Sent: Friday, February 22, 2019 3:18 PM
To: Duross, Jeanne
Subject: A follow-up question

Jeanne,

Thank you for meeting with me yesterday and walking through all of my specific ethics questions. I already have a follow-up question –

AFPM has invited Steven Cook to speak at a meeting in March and was interested in having me accompany him. There will be at least a dozen companies in the room in addition to AFPM staff. Is it permissible for me to attend since there are at least five (I think that's the threshold number) other companies in the room? Coming from a trade association, it's not clear to me whether the trade association's member companies count towards the threshold of having other companies present.

I also want to confirm that Shannon is planning to reach out to me to discuss potential recusals?

Thanks!

Taylor Hoverman

Policy Counsel to the Assistant Administrator
Office of Land and Emergency Management (OLEM)
United States Environmental Protection Agency
1301 Constitution Ave, NW
Washington, DC 20004



202-566-2705

From: [Fugh, Justina](#)
To: [Duross, Jeanne](#); [Griffo, Shannon](#)
Subject: RE: A follow-up question
Date: Friday, February 22, 2019 4:57:17 PM

(b) (5)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: Duross, Jeanne
Sent: Friday, February 22, 2019 3:47 PM
To: Fugh, Justina <Fugh.Justina@epa.gov>; Griffo, Shannon <Griffo.Shannon@epa.gov>
Subject: Fw: A follow-up question

Forwarding this question to you (b) (5)

[REDACTED]

-Jeanne

Jeanne M. Duross/ Ethics Attorney/Office of General Counsel, Ethics/U.S.
EPA/4407F--WJCN (Mail Code 2248A)/Phone (202)564-6595

From: Hoverman, Taylor
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202-566-2705

From: [Duross, Jeanne](#)
To: [Fugh, Justina](#); [Griffo, Shannon](#)
Subject: RE: A follow-up question
Date: Tuesday, February 26, 2019 9:31:03 AM
Attachments: [image001.png](#)

Great.

(b) (5)

A large rectangular area of the email body is completely redacted with a solid black box.

So, after staff meeting, I'll look at the scheduler and see what works.

Ethics Attorney | Office of General Counsel | US EPA | Mail Code 2311A | Room 4407F North,
William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use
20004 for the zip code) | phone 202-564-6595| epa mobile 202-579-7848|fax 202-564-1772


From: Fugh, Justina
Sent: Tuesday, February 26, 2019 9:26 AM
To: Duross, Jeanne <Duross.Jeanne@epa.gov>; Griffo, Shannon <Griffo.Shannon@epa.gov>
Subject: RE: A follow-up question

Yes, we should.

From: Duross, Jeanne
Sent: Monday, February 25, 2019 12:28 PM
To: Fugh, Justina <Fugh.Justina@epa.gov>; Griffo, Shannon <Griffo.Shannon@epa.gov>
Subject: Fw: A follow-up question

(b) (5)

A large rectangular area of the email body is completely redacted with a solid black box.


Jeanne M. Duross/ Ethics Attorney/Office of General Counsel, Ethics/U.S.
EPA/4407F--WJCN (Mail Code 2248A)/Phone (202)564-6595 

From: Hoverman, Taylor
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Sent: Monday, February 25, 2019 12:13 PM
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EPA/4407F--WJCN (Mail Code 2248A)/Phone (202)564-6595

From: Hoverman, Taylor
Sent: Friday, February 22, 2019 3:18 PM
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Taylor Hoverman

Policy Counsel to the Assistant Administrator
Office of Land and Emergency Management (OLEM)
United States Environmental Protection Agency
1301 Constitution Ave, NW
Washington, DC 20004
202-566-2705

From: [Hoverman, Taylor](#)
To: [Fugh, Justina](#)
Cc: [Duross, Jeanne](#); [Griffo, Shannon](#)
Subject: RE: Advice Re PersoDuross, Jeanne <Duross.Jeanne@epa.gov>; Griffo, Shannon <Griffo.Shannon@epa.gov>nal (b) (6)
Date: Thursday, April 04, 2019 6:12:31 PM

As always, thanks so much for the help and counsel!

Taylor Hoverman

Policy Counsel to the Assistant Administrator

Office of Land and Emergency Management

U.S. Environmental Protection Agency

O: 202-566-2705

C: (b) (6)

From: Fugh, Justina
Sent: Thursday, April 4, 2019 6:11 PM
To: Hoverman, Taylor <hoverman.taylor@epa.gov>
Cc: Duross, Jeanne <Duross.Jeanne@epa.gov>; Griffo, Shannon <Griffo.Shannon@epa.gov>
Subject: RE: Advice Re PersoDuross, Jeanne <Duross.Jeanne@epa.gov>; Griffo, Shannon <Griffo.Shannon@epa.gov>nal (b) (6)

Hi Taylor,

Thanks for reaching out. As we discussed, on occasion, (b) (6)

(b) (6). The event did not take place during business hours, you were not compensated, and the sponsor was not a federally registered lobbyist. You did not refer to your EPA position or title; in fact, neither of you even shared your last names. You did indicate that you are both attorneys and, when asked what firm, indicate that you work for the federal government.

I advised you that this sort of situation does not create any ethics issues. You may speak at these sorts of events and do not need to run similar situations by OGC/Ethics in advance. That said, if the sponsor of the event is itself a federally registered lobbyist, then you may want to contact us for advice first. Better safe than sorry!

Justina

Justina Fugh | Director, Ethics Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Hoverman, Taylor
Sent: Thursday, April 04, 2019 5:15 PM
To: Duross, Jeanne <Duross.Jeanne@epa.gov>; Fugh, Justina <Fugh.Justina@epa.gov>; Griffo, Shannon <Griffo.Shannon@epa.gov>
Subject: RE: Advice Re (b) (6)

Justina,

Thanks again for the call and for answering my questions! When you get a chance, do you mind sending me a note memorializing what we discussed as far as speaking engagements and attending events (b) (6) ?

Taylor Hoverman
Policy Counsel to the Assistant Administrator
Office of Land and Emergency Management
U.S. Environmental Protection Agency
O: 202-566-2705
C: (b) (6)

Subject: Advice Re (b) (6)

As we mentioned to you at that time, OGC/Ethics contacted the Office of Government Ethics (OGE) to discuss and to better understand how the Trump Ethics Pledge lobbyist gift ban would impact your ability to accept (b) (6)

[illegible]

In order to determine whether the donor/offeree is a federally registered lobbyist, check the

registries maintained by the U.S. House of Representatives and the U.S. Senate [Note: I always check both registries to be sure]:

<https://lobbyingdisclosure.house.gov/>

<https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>

To perform your search, you will use the legal corporate name/identity of the business offering you the free or discounted stay/meal/product/entertainment/etc. If you do not find that entity listed on the registries, then it is not a federally registered lobbyist for purposes of the Pledge, even if it bears some corporate relationship to an entity that is a federally registered lobbyist. It is considered a separate legal entity. For Pledge purposes, we are only concerned with applying the gift ban to the entities that appear in the registries.

[Note: there may still be optics or impartiality issues associated with accepting a permissible gift. The Standards of Conduct affirmatively state that employees should consider declining otherwise permissible gifts if they believe a reasonable person in possession of the relevant facts would question the employee's integrity or impartiality as a result of accepting the gift. 5 CFR 2635.201(b). If you find yourself asking whether a reasonable person would doubt your impartiality if you were to accept any proposed gift, we recommend contacting OGC/Ethics so that we can assist you with the ethics analysis.]

Here is an example (and I am making this up for illustrative purposes): You are offered a free night's stay at the JW Marriott on 14th Street, and the proposed agreement for your stay and (b) (6) lists "J.W. Marriott Washington, LLC" as the party making the offer. In this case, you would be able to accept the offer without violating the Pledge because no entity by that name is listed in the registries. In contrast, "Marriott International, Inc." is a federally registered lobbyist -- so if the offer were coming from "Marriott International, Inc." then you would have to decline it.

OGE Advice Regarding Gift Reporting on Annual Financial Disclosure

OGE has not reached a final decision regarding (b) (5), (b) (6)

OGE intends to analyze the reporting issue further and will report back to us when they reach a conclusion.

In the meantime, (b) (5), (b) (6)

If you have any questions about the advice from OGE or if we can help you sort out any issues that arise as you move forward, please do not hesitate to give us a call.

Best,

Jeanne

Ethics Attorney | Office of General Counsel | US EPA | Mail Code 2311A | Room 44013 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-6595| epa mobile 202-579-7848|fax 202-564-1772

(b) (6)

OGE Advice Regarding Lobbyist Gift Ban

OGE stressed that you absolutely do need to take care that you do not accept a gift from a federally registered lobbyist in the course of your activities with (b) (6). Here is how OGE has instructed you to proceed:

In order to determine whether the donor/offeror is a federally registered lobbyist, check the registries maintained by the U.S. House of Representatives and the U.S. Senate [Note: I always check both registries to be sure]:

<https://lobbyingdisclosure.house.gov/>

<https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>

To perform your search, you will use the legal corporate name/identity of the business offering you the free or discounted stay/meal/product/entertainment/etc. If you do not find that entity listed on the registries, then it is not a federally registered lobbyist for purposes of the Pledge, even if it bears some corporate relationship to an entity that is a federally registered lobbyist. It is considered a separate legal entity. For Pledge purposes, we are only concerned with applying the gift ban to the entities that appear in the registries.

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Best,

Jeanne

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William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-6595| epa mobile 202-579-7848|fax 202-564-1772

From: [Hoverman, Taylor](#)
To: [Fugh, Justina](#)
Subject: RE: New Employee Ethics Training
Date: Thursday, February 14, 2019 6:56:59 PM

My memory is failing me, but what a rockstar to (b) (6)

Taylor Hoverman

Policy Counsel to the Assistant Administrator
Office of Land and Emergency Management (OLEM)
United States Environmental Protection Agency
1301 Constitution Ave, NW
Washington, DC 20004
202-566-2705

From: Fugh, Justina
Sent: Thursday, February 14, 2019 4:16 PM
To: Hoverman, Taylor <hoverman.taylor@epa.gov>
Subject: RE: New Employee Ethics Training

Hi Taylor,

Yep, her name is Jennie Keith, and (b) (6)

Justina

From: Hoverman, Taylor
Sent: Thursday, February 14, 2019 2:52 PM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: RE: New Employee Ethics Training

Thank you, Justina! (b) (6)

I look forward to meeting you soon.

Taylor Hoverman

Policy Counsel to the Assistant Administrator
Office of Land and Emergency Management (OLEM)
United States Environmental Protection Agency
1301 Constitution Ave, NW
Washington, DC 20004
202-566-2705

From: Fugh, Justina
Sent: Thursday, February 14, 2019 2:48 PM
To: Hoverman, Taylor <hoverman.taylor@epa.gov>
Subject: RE: New Employee Ethics Training

Hi Taylor,

Belated greetings and welcome to EPA! I hear from Jennie Keith (in OGC/Ethics) that you and she were law school classmates, so that's another neat connection. You'll be meeting with Jeanne Duross soon, and I'll be assigning you a financial disclosure requirement tomorrow (I

tend to do these sorts of administrative housekeeping functions on Friday). Until then, welcome aboard and I hope you love it here at EPA!

Cheers,

justina

Justina Fugh | Director, Ethics Law Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Hoverman, Taylor

Sent: Tuesday, February 12, 2019 3:57 PM

To: Fugh, Justina <Fugh.Justina@epa.gov>

Subject: New Employee Ethics Training

Justina,

Today is my first day, and Patricia Moore instructed me to contact you for New Employee Ethics Training. FYI – I received a calendar invite from Jeanne Duross for an ethics training yesterday, but today is my first day. I just sent her a note letting her know I need to reschedule. Thanks!

From: [Hoverman, Taylor](#)
To: [Griffo, Shannon](#)
Cc: [Fugh, Justina](#); [Duross, Jeanne](#)
Subject: RE: OGC/Ethics Follow-up
Date: Thursday, March 14, 2019 9:33:30 AM

Thank you!

Taylor Hoverman
Policy Counsel to the Assistant Administrator
Office of Land and Emergency Management
U.S. Environmental Protection Agency
O: 202-566-2705
C: (b) (6)

From: Griffo, Shannon
Sent: Wednesday, March 13, 2019 4:35 PM
To: Hoverman, Taylor <hoverman.taylor@epa.gov>
Cc: Fugh, Justina <Fugh.Justina@epa.gov>; Duross, Jeanne <Duross.Jeanne@epa.gov>
Subject: OGC/Ethics Follow-up

Hi Taylor,

As promised, here's a quick recap of some of the things we discussed yesterday. (Justina and Jeanne, feel free to chime in if I'm forgetting anything!)

We see no problem with you working on the overall RMP rule - a particular matter of general applicability. However, our prudent advice is that you do not work on any of the specific parts of the RMP rule that you previously worked on while at AFPM. Generally speaking, lawyers owe a duty of confidentiality to their former clients and can't "switch sides" on the same specific party matter (or a substantially related matter). So be mindful of your bar rules, especially Rule 1.6 (confidentiality of information) and Rule 1.9 (duties to former clients).

Also please remember that you should not work on anything related to your former employer, which includes any comments or letters submitted by AFPM. You should not review or take any other action on any comments submitted by your former employer.

I'll be in touch soon with a draft recusal statement for you to review. In the meantime, please let us know if you have any other questions!

Thanks,
Shannon

Shannon Griffo
Ethics Attorney
Office of General Counsel, Ethics

U.S. Environmental Protection Agency
(202) 564-7061
Griffo.Shannon@epa.gov

From: [Fugh, Justina](#)
To: [Hoverman, Taylor](#)
Subject: RE: quick question about your financial disclosure report
Date: Tuesday, May 28, 2019 4:22:00 PM

No need to apologize! Remember, when I assigned this task to you, I said this was a wretched and exacting report, and it's true! I'll make the change and then certify your report. Thanks!

From: Hoverman, Taylor
Sent: Tuesday, May 28, 2019 4:22 PM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: RE: quick question about your financial disclosure report

Yes, looks good. Sorry for the oversight on my part!

Taylor Hoverman
Policy Counsel to the Assistant Administrator
Office of Land and Emergency Management
U.S. Environmental Protection Agency
O: 202-566-2705
C: (b) (6)

From: Fugh, Justina
Sent: Tuesday, May 28, 2019 4:20 PM
To: Hoverman, Taylor <hoverman.taylor@epa.gov>
Subject: quick question about your financial disclosure report

Hi Taylor,
Just letting you know that I need some help with your report. You have to provide a brief description of duties for Part 4, so with your permission, I propose to add this:

- (b) (6)
-

Okay with you?
Justina

Justina Fugh | Director, Ethics Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: [Hoverman, Taylor](#)
To: [Griffo, Shannon](#)
Subject: RE: Recusals Meeting
Date: Wednesday, March 06, 2019 3:58:33 PM

Thank you! See you next week.

Taylor Hoverman

Policy Counsel to the Assistant Administrator
Office of Land and Emergency Management (OLEM)
United States Environmental Protection Agency
1301 Constitution Ave, NW
Washington, DC 20004
202-566-2705 (direct)
(b) (6) (cell)

From: Griffo, Shannon
Sent: Wednesday, March 6, 2019 3:57 PM
To: Hoverman, Taylor <hoverman.taylor@epa.gov>
Subject: RE: Recusals Meeting

I'll send out a scheduler now to get something on our calendars for Tuesday. Thanks Taylor!

Shannon Griffo
Ethics Attorney
Office of General Counsel, Ethics
U.S. Environmental Protection Agency
(202) 564-7061
Griffo.Shannon@epa.gov

From: Hoverman, Taylor
Sent: Wednesday, March 06, 2019 3:26 PM
To: Griffo, Shannon <Griffo.Shannon@epa.gov>
Subject: RE: Recusals Meeting

Tomorrow afternoon is pretty packed, so Tuesday will be better for me. Only times I'm not available: 10-11 and 4-4:30.

Taylor Hoverman

Policy Counsel to the Assistant Administrator
Office of Land and Emergency Management (OLEM)
United States Environmental Protection Agency
1301 Constitution Ave, NW
Washington, DC 20004
202-566-2705 (direct)

(b) (6) (cell)

From: Griffio, Shannon
Sent: Wednesday, March 6, 2019 2:13 PM
To: Hoverman, Taylor <hoverman.taylor@epa.gov>
Subject: RE: Recusals Meeting

Hi Taylor,

I was hoping to include Jeanne in our meeting, but looks like (b) (6) today (and likely tomorrow as well). I'm happy to meet tomorrow or we can schedule something early next week to include Jeanne. I have an off-site meeting but should be back by 1:30. Want to try for tomorrow at 1:30? Or next Tuesday? Jeanne and I are free anytime Tues except 11:30-1.

Thanks!
Shannon

Shannon Griffio
Ethics Attorney
Office of General Counsel, Ethics
U.S. Environmental Protection Agency
(202) 564-7061
Griffio.Shannon@epa.gov

From: Hoverman, Taylor
Sent: Tuesday, March 05, 2019 11:40 AM
To: Griffio, Shannon <Griffio.Shannon@epa.gov>
Subject: RE: Recusals Meeting

Shannon,
Sorry for my delayed response – I am available today except 3-3:30 and 4:30-5 and Thursday except 2:15-4 and 4:30-5.

Taylor Hoverman
Policy Counsel to the Assistant Administrator
Office of Land and Emergency Management (OLEM)
United States Environmental Protection Agency
1301 Constitution Ave, NW
Washington, DC 20004
202-566-2705

From: Griffio, Shannon
Sent: Thursday, February 28, 2019 1:32 PM
To: Hoverman, Taylor <hoverman.taylor@epa.gov>

Subject: RE: Recusals Meeting

Hi Taylor,

We can definitely set something up if you like. I know that Jeanne has been providing you with some guidance on meetings with your former employer. Normally I'll start drafting a recusal statement once you've completed your public financial disclosure form (SF-278). Then we'll know whether you have any financial conflict of interests to be included with your Ethics Pledge obligations. However, I spoke with Justina this morning and they've been having some technical glitches with the system, and she hasn't even been able to assign you a new entrant report yet. But the good news is that it's now resolved and you should be assigned a 278 soon to complete.

Do you have any available time next Tuesday or Thursday? I'll be teleworking on the other days next week.

Thanks,
Shannon

Shannon Griffo
Ethics Attorney
Office of General Counsel, Ethics
U.S. Environmental Protection Agency
(202) 564-7061
Griffo.Shannon@epa.gov

From: Hoverman, Taylor
Sent: Wednesday, February 27, 2019 6:55 PM
To: Griffo, Shannon <Griffo.Shannon@epa.gov>
Subject: Recusals Meeting

Shannon,
Can we please schedule a time to meet and discuss my potential, if any, recusals? Thanks!

Taylor Hoverman
Policy Counsel to the Assistant Administrator
Office of Land and Emergency Management (OLEM)
United States Environmental Protection Agency
1301 Constitution Ave, NW
Washington, DC 20004
202-566-2705

From: [Hoverman, Taylor](#)
To: [Fugh, Justina](#)
Cc: [Duross, Jeanne](#)
Subject: Re: Supplemental Document
Date: Wednesday, May 15, 2019 8:57:56 AM

Justina,

Thank you. I will do that.

Taylor Hoverman
Policy Counsel
OLEM

Sent from my iPhone. Please excuse typos or brevity.

On May 14, 2019, at 10:51 PM, Fugh, Justina <Fugh.Justina@epa.gov> wrote:

Hi Taylor,

I am inclined to say that (b) (6)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Justina

Justina Fugh | Director, Ethics Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Hoverman, Taylor
Sent: Thursday, May 09, 2019 6:52 PM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Cc: Duross, Jeanne <Duross.Jeanne@epa.gov>
Subject: RE: Supplemental Document

Justina,

Thanks for getting back to me! That is mostly correct – just two tweaks: (b) (6)

[REDACTED]

[REDACTED]

[REDACTED]

(b) (6)

(b) (6) for purposes of the financial disclosure report, so I'm good on that front. (b) (6)

Taylor Hoverman
Policy Counsel to the Assistant Administrator
Office of Land and Emergency Management
U.S. Environmental Protection Agency
O: 202-566-2705
C: (b) (6)

From: Fugh, Justina
Sent: Monday, May 6, 2019 6:21 PM
To: Hoverman, Taylor <hoverman.taylor@epa.gov>
Cc: Duross, Jeanne <Duross.Jeanne@epa.gov>
Subject: RE: Supplemental Document

Hi Taylor,
I believe I may have completely forgotten to take care of this for you. I had a nagging feeling that I was neglecting some emails, so I had to go back to the beginning of April to verify. Found this note from you, but now I can't fully recall the details.

I believe that we discussed the fact that you're (b) (6)

(b) (6)

(b) (6)

(b) (6)

(b) (6)

(b) (6)

(b) (6)

(b) (6)

(b) (6)

(b) (6)

(b) (6)

(b) (6)

Is that your recollection too, or did I say that I would add a note to your financial disclosure report as well?
Justina

Justina Fugh | Director, Ethics Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Hoverman, Taylor
Sent: Thursday, April 11, 2019 11:53 AM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: Supplemental Document

Justina,

(b) (6)

[REDACTED]

[REDACTED]

What is the best way to proceed? Thanks!

Taylor Hoverman
Policy Counsel to the Assistant Administrator
Office of Land and Emergency Management
U.S. Environmental Protection Agency
O: 202-566-2705
C: (b) (6)

From: [Hoverman, Taylor](#)
To: [Fugh, Justina](#)
Subject: RE: Supplemental Document
Date: Wednesday, April 17, 2019 11:14:44 AM

Justina,

I just wanted to follow up here to make sure my record is complete and accurate. How should I proceed? Thank you!

Taylor Hoverman

Policy Counsel to the Assistant Administrator

Office of Land and Emergency Management

U.S. Environmental Protection Agency

O: 202-566-2705

C: (b) (6)

From: Hoverman, Taylor
Sent: Thursday, April 11, 2019 11:53 AM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: Supplemental Document

Justina,

(b) (6)

(b) (6)

(b) (6)

What is the best way to proceed? Thanks!

Taylor Hoverman

Policy Counsel to the Assistant Administrator

Office of Land and Emergency Management

U.S. Environmental Protection Agency

O: 202-566-2705

C: (b) (6)

From: [Hoverman, Taylor](#)
To: [Griffo, Shannon](#)
Subject: RE: Voicemail
Date: Monday, June 10, 2019 4:41:47 PM
Attachments: [Recusal Statement Signed.pdf](#)

Shannon,

Attached is my signed recusal statement. Hopefully we can touch base tomorrow.

Taylor Hoverman
Policy Counsel to the Assistant Administrator
Office of Land and Emergency Management
U.S. Environmental Protection Agency
O: 202-566-2705
C: (b) (6)

From: Griffo, Shannon
Sent: Monday, June 3, 2019 4:06 PM
To: Hoverman, Taylor <hoverman.taylor@epa.gov>
Subject: RE: Voicemail

And here is your draft recusal statement for your review. OGC/Ethics has previously advised you – and you have assiduously been following that advice – regarding your ethics obligations, but this document will formally notify folks about your obligations.

Once it's ready for signature, you'll print it out, sign and date, then pdf it back to us. But we can chat more tomorrow. Thanks!

Shannon Griffo
Ethics Attorney
Office of General Counsel, Ethics
U.S. Environmental Protection Agency
(202) 564-7061
Griffo.Shannon@epa.gov

From: Hoverman, Taylor
Sent: Monday, June 03, 2019 3:40 PM
To: Griffo, Shannon <Griffo.Shannon@epa.gov>
Subject: RE: Voicemail

Wonderful! See you then.

Taylor Hoverman
Policy Counsel to the Assistant Administrator
Office of Land and Emergency Management

U.S. Environmental Protection Agency
O: 202-566-2705
C: (b) (6)

From: Griffo, Shannon
Sent: Monday, June 3, 2019 12:59 PM
To: Hoverman, Taylor <hoverman.taylor@epa.gov>
Subject: RE: Voicemail

Hi Taylor,

10am works for me. See you tomorrow!

Thanks,
Shannon

Shannon Griffo
Ethics Attorney
Office of General Counsel, Ethics
U.S. Environmental Protection Agency
(202) 564-7061
Griffo.Shannon@epa.gov

From: Hoverman, Taylor
Sent: Monday, June 03, 2019 11:47 AM
To: Griffo, Shannon <Griffo.Shannon@epa.gov>
Subject: RE: Voicemail

Shannon,

Hope you had a nice weekend! If it still works for you, I will plan to come by tomorrow before 11:30 – does 10am work? Perfect timing on the draft recusal statement, so I will have the opportunity to ask any questions I may have when I see you tomorrow.

Taylor Hoverman
Policy Counsel to the Assistant Administrator
Office of Land and Emergency Management
U.S. Environmental Protection Agency
O: 202-566-2705
C: (b) (6)

From: Griffo, Shannon
Sent: Thursday, May 30, 2019 2:08 PM
To: Hoverman, Taylor <hoverman.taylor@epa.gov>

Subject: RE: Voicemail

No worries. I leave on the earlier side, and can only stick around until about 3:15 today. Monday I'm teleworking so you can call my work number anytime – it's forwarded. And Tuesday, I'll be back in the office, available anytime before 11:30 and then again after 2.

I see your public financial disclosure report was certified earlier this week, so I should be able to have a draft recusal statement for you to review by Monday.

Thanks!

Shannon Griffo
Ethics Attorney
Office of General Counsel, Ethics
U.S. Environmental Protection Agency
(202) 564-7061
Griffo.Shannon@epa.gov

From: Hoverman, Taylor
Sent: Thursday, May 30, 2019 1:23 PM
To: Griffo, Shannon <Griffo.Shannon@epa.gov>
Subject: RE: Voicemail

Need to get a last minute briefing to the Administrator's office by 3pm now, so I don't think I will be able to make it over at 2pm. Would any time after 3pm work? Or what does your schedule look like next Monday or Tuesday?

Taylor Hoverman
Policy Counsel to the Assistant Administrator
Office of Land and Emergency Management
U.S. Environmental Protection Agency
O: 202-566-2705
C: (b) (6)

From: Griffo, Shannon
Sent: Thursday, May 30, 2019 9:29 AM
To: Hoverman, Taylor <hoverman.taylor@epa.gov>
Subject: RE: Voicemail

Morning! Yes, 2:00 still works for me.

Thanks,
Shannon

Shannon Griffo

Ethics Attorney
Office of General Counsel, Ethics
U.S. Environmental Protection Agency
(202) 564-7061
Griffo.Shannon@epa.gov

From: Hoverman, Taylor
Sent: Thursday, May 30, 2019 9:24 AM
To: Griffo, Shannon <Griffo.Shannon@epa.gov>
Subject: Re: Voicemail

Good morning!

I don't think I'll be able to make it over before 10:30 any longer. Does it still work if I come by at 2?

Taylor Hoverman
Policy Counsel
OLEM
(b) (6)

Sent from my iPhone. Please excuse typos or brevity.

On May 29, 2019, at 5:27 PM, Griffo, Shannon <Griffo.Shannon@epa.gov> wrote:

Hi Taylor,

Sorry for missing you. (b) (6) but will be in tomorrow. I'm available anytime before 10:30. I come in early so feel free to give me a ring when you have time or come stop by my office - 6011, in the corridor between North and South buildings. I've got meetings starting at 10:30 and my only other free time will be between 2-3. So let's plan on connecting tomorrow since I'm out Friday.

Thanks!
Shannon

Sent from my iPhone

On May 29, 2019, at 4:29 PM, Hoverman, Taylor <hoverman.taylor@epa.gov> wrote:

Hi Shannon,

I left you a voicemail this morning and am hoping we can touch base sometime this week. Do you mind giving me a call when you have a few minutes? Thank you!

Taylor Hoverman
Policy Counsel to the Assistant Administrator

Office of Land and Emergency Management
U.S. Environmental Protection Agency
O: 202-566-2705
C: (b) (6)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
SOLID WASTE AND
EMERGENCY RESPONSE

NOW THE
OFFICE OF LAND AND
EMERGENCY MANAGEMENT

MEMORANDUM

SUBJECT: Recusal Statement

FROM: Taylor Hoverman
Policy Counsel

Taylor Hoverman
06/05/19

TO: Barry Breen
Acting Assistant Administrator

I have previously consulted with the Office of General Counsel/Ethics (OGC/Ethics) and been advised about my ethics obligations. This memorandum formally notifies you of my continuing obligation to recuse myself from participating personally and substantially in certain matters in which I have a financial interest, or a personal or business relationship. I also understand that I have obligations pursuant to Executive Order 13770 and the Trump Ethics Pledge that I signed, as well as my own attorney bar obligations.

FINANCIAL CONFLICTS OF INTEREST

As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter in which I know that I have a financial interest directly and predictably affected by the matter, or in which I know that a person whose interests are imputed to me has a financial interest directly and predictably affected by the matter, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). I understand that the interests of the following persons are imputed to me: any spouse or minor child of mine; any general partner of a partnership in which I am a limited or general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

I have consulted with OGC/Ethics and been advised that I do not currently have any significant financial conflicts of interest but will remain vigilant and notify OGC/Ethics immediately should my financial situation change.

OBLIGATIONS UNDER EXECUTIVE ORDER 13770

Pursuant to Section 1, Paragraph 6 of the Executive Order, I understand that I am prohibited from participating in any particular matter involving specific parties in which my former employer, **American Fuel & Petrochemical Manufacturers**, is a party or represents a

party. Under the terms of the Ethics Pledge, I understand that my recusal lasts until February 12, 2021, which is two years from the date that I joined federal service.

I have been advised by OGC/Ethics that, for the purposes of this pledge obligation, the term “particular matters involving specific parties” is broadened to include any meetings or other communication relating to the performance of my official duties, unless the communication applies to a particular matter of general applicability and participation in the meeting or other event is open to all interested parties. I am further advised that the term “open to all interested parties” means that the meeting should include a multiplicity of parties representing a diversity of viewpoints. If my former employer is present, then I understand that, generally speaking, at least four other parties should be present to ensure that a diversity of viewpoints is represented and not the same united perspective.

ATTORNEY BAR OBLIGATIONS

Pursuant to my obligations under my bar rules, I recognize that I am obliged to protect the confidences of my former clients. I also understand that I cannot participate in any matter that is the same as or substantially related to the same specific party matter that I participated in personally and substantially while in private practice, unless my bar provides for and I first obtain informed consent and notify OGC/Ethics.

SCREENING ARRANGEMENT

In order to ensure that I do not participate in matters relating to the entity listed above, I will instruct Nick Hilosky or Becky Brooks, to assist in screening EPA matters directed to my attention that involve American Fuel & Petrochemical Manufacturers. All inquiries and comments involving this entity should be directed to Nick Hilosky or Becky Brooks without my knowledge or involvement.

If Nick Hilosky or Becky Brooks determine that a particular matter will directly involve my former employer, then he/she will refer it for action or assignment to another, without my knowledge or involvement. In the event that he/she is unsure whether an issue is a particular matter from which I am recused, then he/she will consult with OGC/Ethics for a determination. I will provide a copy of this memorandum to Justina Fugh, Director, Ethics Office.

UPDATE AS NECESSARY

In consultation with OGC/Ethics, I will revise and update my recusal statement whenever warranted by changed circumstances, including changes in my financial interests, changes in my personal or business relationships, or any changes to my EPA duties. In the event of any changes to my screening arrangement, I will provide a copy of the revised recusal statement to you and OGC/Ethics.

cc: Steven Cook, Deputy Assistant Administrator
Justina Fugh, Director, Ethics Office

From: [Hoverman, Taylor](#)
To: [Griffo, Shannon](#)
Subject: RE: Voicemail
Date: Tuesday, June 11, 2019 3:00:15 PM

Sounds good.

Taylor Hoverman
Policy Counsel to the Assistant Administrator
Office of Land and Emergency Management
U.S. Environmental Protection Agency
O: 202-566-2705
C: (b) (6)

From: Griffo, Shannon
Sent: Tuesday, June 11, 2019 2:50 PM
To: Hoverman, Taylor <hoverman.taylor@epa.gov>
Subject: RE: Voicemail

I'll try to call you around 3:30.

Shannon Griffo
Ethics Attorney
Office of General Counsel, Ethics
U.S. Environmental Protection Agency
(202) 564-7061
Griffo.Shannon@epa.gov

From: Hoverman, Taylor
Sent: Tuesday, June 11, 2019 12:55 PM
To: Griffo, Shannon <Griffo.Shannon@epa.gov>
Subject: RE: Voicemail

Sure – that works! I have a call at 4pm, but I can skip it, if needed.

Taylor Hoverman
Policy Counsel to the Assistant Administrator
Office of Land and Emergency Management
U.S. Environmental Protection Agency
O: 202-566-2705
C: (b) (6)

From: Griffo, Shannon
Sent: Tuesday, June 11, 2019 12:39 PM
To: Hoverman, Taylor <hoverman.taylor@epa.gov>

Subject: RE: Voicemail

Thanks Taylor!

I'm teleworking but I've been stuck on the phone most of the day. My last call of the day starts at 3:00. Can I give you a ring after that? Or let me know again when you're available. (b) (6)
[REDACTED] but I'm free tomorrow morning.

Shannon Griffo
Ethics Attorney
Office of General Counsel, Ethics
U.S. Environmental Protection Agency
(202) 564-7061
Griffo.Shannon@epa.gov

From: Hoverman, Taylor
Sent: Monday, June 10, 2019 4:42 PM
To: Griffo, Shannon <Griffo.Shannon@epa.gov>
Subject: RE: Voicemail

Shannon,

Attached is my signed recusal statement. Hopefully we can touch base tomorrow.

Taylor Hoverman
Policy Counsel to the Assistant Administrator
Office of Land and Emergency Management
U.S. Environmental Protection Agency
O: 202-566-2705
C: (b) (6)

From: Griffo, Shannon
Sent: Monday, June 3, 2019 4:06 PM
To: Hoverman, Taylor <hoverman.taylor@epa.gov>
Subject: RE: Voicemail

And here is your draft recusal statement for your review. OGC/Ethics has previously advised you – and you have assiduously been following that advice – regarding your ethics obligations, but this document will formally notify folks about your obligations.

Once it's ready for signature, you'll print it out, sign and date, then pdf it back to us. But we can chat more tomorrow. Thanks!

Shannon Griffo
Ethics Attorney

Office of General Counsel, Ethics
U.S. Environmental Protection Agency
(202) 564-7061
Griffo.Shannon@epa.gov

From: Hoverman, Taylor
Sent: Monday, June 03, 2019 3:40 PM
To: Griffo, Shannon <Griffo.Shannon@epa.gov>
Subject: RE: Voicemail

Wonderful! See you then.

Taylor Hoverman
Policy Counsel to the Assistant Administrator
Office of Land and Emergency Management
U.S. Environmental Protection Agency
O: 202-566-2705
C: (b) (6)

From: Griffo, Shannon
Sent: Monday, June 3, 2019 12:59 PM
To: Hoverman, Taylor <hoverman.taylor@epa.gov>
Subject: RE: Voicemail

Hi Taylor,

10am works for me. See you tomorrow!

Thanks,
Shannon

Shannon Griffo
Ethics Attorney
Office of General Counsel, Ethics
U.S. Environmental Protection Agency
(202) 564-7061
Griffo.Shannon@epa.gov

From: Hoverman, Taylor
Sent: Monday, June 03, 2019 11:47 AM
To: Griffo, Shannon <Griffo.Shannon@epa.gov>
Subject: RE: Voicemail

Shannon,

Hope you had a nice weekend! If it still works for you, I will plan to come by tomorrow before 11:30 – does 10am work? Perfect timing on the draft recusal statement, so I will have the opportunity to ask any questions I may have when I see you tomorrow.

Taylor Hoverman
Policy Counsel to the Assistant Administrator
Office of Land and Emergency Management
U.S. Environmental Protection Agency
O: 202-566-2705
C: (b) (6)

From: Griffo, Shannon
Sent: Thursday, May 30, 2019 2:08 PM
To: Hoverman, Taylor <hoverman.taylor@epa.gov>
Subject: RE: Voicemail

No worries. I leave on the earlier side, and can only stick around until about 3:15 today. Monday I'm teleworking so you can call my work number anytime – it's forwarded. And Tuesday, I'll be back in the office, available anytime before 11:30 and then again after 2.

I see your public financial disclosure report was certified earlier this week, so I should be able to have a draft recusal statement for you to review by Monday.

Thanks!

Shannon Griffo
Ethics Attorney
Office of General Counsel, Ethics
U.S. Environmental Protection Agency
(202) 564-7061
Griffo.Shannon@epa.gov

From: Hoverman, Taylor
Sent: Thursday, May 30, 2019 1:23 PM
To: Griffo, Shannon <Griffo.Shannon@epa.gov>
Subject: RE: Voicemail

Need to get a last minute briefing to the Administrator's office by 3pm now, so I don't think I will be able to make it over at 2pm. Would any time after 3pm work? Or what does your schedule look like next Monday or Tuesday?

Taylor Hoverman
Policy Counsel to the Assistant Administrator
Office of Land and Emergency Management

U.S. Environmental Protection Agency
O: 202-566-2705
C: (b) (6)

From: Griffo, Shannon
Sent: Thursday, May 30, 2019 9:29 AM
To: Hoverman, Taylor <hoverman.taylor@epa.gov>
Subject: RE: Voicemail

Morning! Yes, 2:00 still works for me.

Thanks,
Shannon

Shannon Griffo
Ethics Attorney
Office of General Counsel, Ethics
U.S. Environmental Protection Agency
(202) 564-7061
Griffo.Shannon@epa.gov

From: Hoverman, Taylor
Sent: Thursday, May 30, 2019 9:24 AM
To: Griffo, Shannon <Griffo.Shannon@epa.gov>
Subject: Re: Voicemail

Good morning!
I don't think I'll be able to make it over before 10:30 any longer. Does it still work if I come by at 2?

Taylor Hoverman
Policy Counsel
OLEM
(b) (6)

Sent from my iPhone. Please excuse typos or brevity.

On May 29, 2019, at 5:27 PM, Griffo, Shannon <Griffo.Shannon@epa.gov> wrote:

Hi Taylor,

Sorry for missing you. (b) (6) but will be in tomorrow. I'm available anytime before 10:30. I come in early so feel free to give me a ring when you have time or come stop by my office - 6011, in the corridor between North and South buildings. I've got meetings starting at 10:30 and my only other free time will be between 2-3. So let's plan on connecting tomorrow since I'm out Friday.

Thanks!
Shannon

Sent from my iPhone

On May 29, 2019, at 4:29 PM, Hoverman, Taylor <hoverman.taylor@epa.gov> wrote:

Hi Shannon,

I left you a voicemail this morning and am hoping we can touch base sometime this week. Do you mind giving me a call when you have a few minutes? Thank you!

Taylor Hoverman
Policy Counsel to the Assistant Administrator
Office of Land and Emergency Management
U.S. Environmental Protection Agency
O: 202-566-2705
C: (b) (6)

From: [Hoverman, Taylor](#)
To: [Griffo, Shannon](#)
Subject: RE: Voicemail
Date: Monday, June 03, 2019 4:09:20 PM

Thank you! I will bring this with me tomorrow morning with my specific questions.

Taylor Hoverman
Policy Counsel to the Assistant Administrator
Office of Land and Emergency Management
U.S. Environmental Protection Agency
O: 202-566-2705
C: (b) (6)

From: Griffo, Shannon
Sent: Monday, June 3, 2019 4:06 PM
To: Hoverman, Taylor <hoverman.taylor@epa.gov>
Subject: RE: Voicemail

And here is your draft recusal statement for your review. OGC/Ethics has previously advised you – and you have assiduously been following that advice – regarding your ethics obligations, but this document will formally notify folks about your obligations.

Once it's ready for signature, you'll print it out, sign and date, then pdf it back to us. But we can chat more tomorrow. Thanks!

Shannon Griffo
Ethics Attorney
Office of General Counsel, Ethics
U.S. Environmental Protection Agency
(202) 564-7061
Griffo.Shannon@epa.gov

From: Hoverman, Taylor
Sent: Monday, June 03, 2019 3:40 PM
To: Griffo, Shannon <Griffo.Shannon@epa.gov>
Subject: RE: Voicemail

Wonderful! See you then.

Taylor Hoverman
Policy Counsel to the Assistant Administrator
Office of Land and Emergency Management
U.S. Environmental Protection Agency
O: 202-566-2705

C: (b) (6)

From: Griffo, Shannon
Sent: Monday, June 3, 2019 12:59 PM
To: Hoverman, Taylor <hoverman.taylor@epa.gov>
Subject: RE: Voicemail

Hi Taylor,

10am works for me. See you tomorrow!

Thanks,
Shannon

Shannon Griffo
Ethics Attorney
Office of General Counsel, Ethics
U.S. Environmental Protection Agency
(202) 564-7061
Griffo.Shannon@epa.gov

From: Hoverman, Taylor
Sent: Monday, June 03, 2019 11:47 AM
To: Griffo, Shannon <Griffo.Shannon@epa.gov>
Subject: RE: Voicemail

Shannon,

Hope you had a nice weekend! If it still works for you, I will plan to come by tomorrow before 11:30 – does 10am work? Perfect timing on the draft recusal statement, so I will have the opportunity to ask any questions I may have when I see you tomorrow.

Taylor Hoverman
Policy Counsel to the Assistant Administrator
Office of Land and Emergency Management
U.S. Environmental Protection Agency
O: 202-566-2705
C: (b) (6)

From: Griffo, Shannon
Sent: Thursday, May 30, 2019 2:08 PM
To: Hoverman, Taylor <hoverman.taylor@epa.gov>
Subject: RE: Voicemail

No worries. I leave on the earlier side, and can only stick around until about 3:15 today. Monday I'm teleworking so you can call my work number anytime – it's forwarded. And Tuesday, I'll be back in the office, available anytime before 11:30 and then again after 2.

I see your public financial disclosure report was certified earlier this week, so I should be able to have a draft recusal statement for you to review by Monday.

Thanks!

Shannon Griffo
Ethics Attorney
Office of General Counsel, Ethics
U.S. Environmental Protection Agency
(202) 564-7061
Griffo.Shannon@epa.gov

From: Hoverman, Taylor
Sent: Thursday, May 30, 2019 1:23 PM
To: Griffo, Shannon <Griffo.Shannon@epa.gov>
Subject: RE: Voicemail

Need to get a last minute briefing to the Administrator's office by 3pm now, so I don't think I will be able to make it over at 2pm. Would any time after 3pm work? Or what does your schedule look like next Monday or Tuesday?

Taylor Hoverman
Policy Counsel to the Assistant Administrator
Office of Land and Emergency Management
U.S. Environmental Protection Agency
O: 202-566-2705
C: (b) (6)

From: Griffo, Shannon
Sent: Thursday, May 30, 2019 9:29 AM
To: Hoverman, Taylor <hoverman.taylor@epa.gov>
Subject: RE: Voicemail

Morning! Yes, 2:00 still works for me.

Thanks,
Shannon

Shannon Griffo
Ethics Attorney
Office of General Counsel, Ethics

U.S. Environmental Protection Agency
(202) 564-7061
Griffo.Shannon@epa.gov

From: Hoverman, Taylor
Sent: Thursday, May 30, 2019 9:24 AM
To: Griffo, Shannon <Griffo.Shannon@epa.gov>
Subject: Re: Voicemail

Good morning!
I don't think I'll be able to make it over before 10:30 any longer. Does it still work if I come by at 2?

Taylor Hoverman
Policy Counsel
OLEM
(b) (6)

Sent from my iPhone. Please excuse typos or brevity.

On May 29, 2019, at 5:27 PM, Griffo, Shannon <Griffo.Shannon@epa.gov> wrote:

Hi Taylor,

Sorry for missing you. (b) (6) but will be in tomorrow. I'm available anytime before 10:30. I come in early so feel free to give me a ring when you have time or come stop by my office - 6011, in the corridor between North and South buildings. I've got meetings starting at 10:30 and my only other free time will be between 2-3. So let's plan on connecting tomorrow since I'm out Friday.

Thanks!
Shannon

Sent from my iPhone

On May 29, 2019, at 4:29 PM, Hoverman, Taylor <hoverman.taylor@epa.gov> wrote:

Hi Shannon,

I left you a voicemail this morning and am hoping we can touch base sometime this week. Do you mind giving me a call when you have a few minutes? Thank you!

Taylor Hoverman
Policy Counsel to the Assistant Administrator
Office of Land and Emergency Management
U.S. Environmental Protection Agency

O: 202-566-2705

C: (b) (6)

From: [Hoverman, Taylor](#)
To: [Fugh, Justina](#)
Subject: RE: Your ethics filing obligations
Date: Thursday, April 04, 2019 5:13:13 PM

Justina,

Thanks for the call and for answering all of my questions. As I continue working through this reporting, I've come up with a few more:

- (b) (6) [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
- [REDACTED]
[REDACTED]
- [REDACTED]
[REDACTED]

Thanks!

Taylor Hoverman

Policy Counsel to the Assistant Administrator

Office of Land and Emergency Management

U.S. Environmental Protection Agency

O: 202-566-2705

C: (b) (6) [REDACTED]

From: Fugh, Justina
Sent: Monday, March 11, 2019 12:52 PM
To: Hoverman, Taylor <hoverman.taylor@epa.gov>
Subject: Your ethics filing obligations

Hi there,

Welcome to the wonderful world of public financial disclosure reporting! You recently started as an attorney-adviser in OLEM in a Schedule C position. Congratulations! You are required by the Ethics in Government Act of 1978 to file the Public Financial Disclosure Report because you are in this type of position. Your "new entrant" report is due no later than 30 days from your effective date, which was 2/12/19, but we will set your due date 30 days from now. Your report will be due 4/10/19.

EPA uses an entirely electronic filing system (called INTEGRITY) for the public financial disclosure reports. This system is operated and secured by the Office of Government Ethics. You are required by law to complete the form, and we will use it to determine whether you have any financial conflicts of interest or other ethics concerns. There are several important things to know about the OGE-278e: (1) it is a public form (which means that anyone can ask for a copy of your form, but Congress repealed the requirement for public posting to the internet); (2) you have to fill it out every year you are in this position; (3) when you leave, you will have to file a termination report (we'll remind you); and (4) you will be subject to a late filing fee of \$200 for not filing your report timely. Plus, there are also civil and criminal penalties for failure to file at all or for inaccurate reporting.

THE FINANCIAL DISCLOSURE REPORT, OGE-278e

We created an account for you in INTEGRITY and have assigned you a “new entrant” report. If you are asked to provide an address, use the EPA business address. Do not enter your personal home address. Your filer category is “Schedule C.” For help in INTEGRITY, check out the information on the OGC/Ethics website at <http://intranet.epa.gov/ogc/Integrity/Landingpage.html> . The email from INTEGRITY.gov will provide you with specific instructions to log into the federal government’s max.gov site, the gateway to INTEGRITY. If you don’t receive your account notification within three days, then please check your clutter box for messages from INTEGRITY.gov, or contact ethics@epa.gov so that we can follow up.

DEADLINE FOR SUBMITTING THE FORM

INTEGRITY will give you 30 days to complete the form. If you need additional time, you must contact me directly. There is a limit to how much additional time we can give you before late fees kick in, so please pay attention to this requirement.

HELPFUL HINTS FOR FILLING OUT THE FORM

- This is a wretched and exacting form, so just know that you will have to report way more information that you did on the confidential financial disclosure report.
- You will get three different places to report assets: filer’s employment-related assets and income, spouse’s employment related assets and income, and other assets and income. So you are reporting the assets for yourself, your spouse and your dependent children. We don’t really care where you report your assets, just that you do report them all someplace.
- You must include any investment asset that is worth more than \$1000. Include any income from any source that exceeded \$200 during the reporting period (including outside jobs or hobbies, rental income). Include any cash/savings accounts that have more than \$5000.
- Enter each asset separately. Don't lump items together on one line. Be sure to provide the valuation of the asset AND the amount of the income. For assets that aren’t mutual funds, you also have to report the type of income (e.g., dividends, cap gains).
- For 401(k) or IRA plans, provide the name of each of the underlying assets. Don't just write "Vanguard IRA" or "mutual fund." You must specify each asset separately and give the valuation.
- Do not report your federal salary, your spouse’s federal salary, or TSP
- But if you (not your spouse) have any earned income (e.g., outside job, paid pension), you have to report the actual amount of that income.
- But if your spouse works outside of federal service, then include your spouse's employer but not the amount of your spouse's salary. If you are not legally married, do not

report your significant other's employer.

- Don't forget to include any life insurance policies (whole life or variable life) as well as the underlying investments, but do not report term life insurance.
- If you have nothing to report in a section, be sure to click the “nothing to report” button

OTHER ETHICS REQUIREMENTS FOR YOU

STOCK ACT

Because you are required to file the form, you are also now subject to the STOCK Act. You are required to report any purchase, sale or exchange of stocks, bonds, commodities futures or other forms of securities when the amount of the transaction exceeds \$1000. Use INTEGRITY to disclose reportable transactions within 30 days of receiving notification of the transaction, but not later than 45 days after the transaction occurs. You will have to report transactions that occur within brokerage accounts, managed accounts, or other investment vehicles that you own or jointly own with your spouse or another person, as well as transactions of your spouse or dependent children. For a comprehensive review of reportable transactions, see EPA Ethics Advisory 2012-03 at http://intranet.epa.gov/ogc/ethics/Ethics_Advisory_2012-03.pdf and our revised chart, also attached.

HATCH ACT

You are “lesser restricted” under the Hatch Act. During your new employee orientation, the ethics staff went over the Hatch Act, which governs the political activity of government employees. For a refresher, you can familiarize yourself with the Hatch Act as it affects you by reviewing our online [Hatch Act training course](#) or check out our attached handy chart that reminds you of your restrictions.

ETHICS TRAINING

The new employee training you had with Jeanne Duross meets your annual training requirement for 2019. Next year, you'll need to take annual training online. Don't worry. We'll let you know and remind you!

Cheers,

Justina

Justina Fugh | Director, Ethics Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: [Hoverman, Taylor](#)
To: [Fugh, Justina](#)
Subject: RE: Your ethics filing obligations
Date: Thursday, April 04, 2019 7:13:44 PM

Thank you! Will get this submitted tomorrow.

Taylor Hoverman

Policy Counsel to the Assistant Administrator

Office of Land and Emergency Management

U.S. Environmental Protection Agency

O: 202-566-2705

C: (b) (6)

From: Fugh, Justina
Sent: Thursday, April 4, 2019 6:21 PM
To: Hoverman, Taylor <hoverman.taylor@epa.gov>
Subject: RE: Your ethics filing obligations

Hi Taylor,
Please see my notes below:

(b)
)
(6
)

[Redacted text block]

[Redacted text block]

Justina Fugh | Director, Ethics Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Hoverman, Taylor
Sent: Thursday, April 04, 2019 5:13 PM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: RE: Your ethics filing obligations

Justina,

Thanks for the call and for answering all of my questions. As I continue working through this reporting, I've come up with a few more:

(b)
)
(6
)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Thanks!

Taylor Hoverman

Policy Counsel to the Assistant Administrator

Office of Land and Emergency Management

U.S. Environmental Protection Agency

O: 202-566-2705

C: (b) (6)

From: Fugh, Justina

Sent: Monday, March 11, 2019 12:52 PM

To: Hoverman, Taylor <hoverman.taylor@epa.gov>

Subject: Your ethics filing obligations

Hi there,

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THE FINANCIAL DISCLOSURE REPORT, OGE-278e

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- But if you (not your spouse) have any earned income (e.g., outside job, paid pension), you have to report the actual amount of that income.
- But if your spouse works outside of federal service, then include your spouse's employer but not the amount of your spouse's salary. If you are not legally married, do not report your significant other's employer.
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Cheers,

Justina

Justina Fugh | Director, Ethics Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

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From: Hoverman, Taylor
Sent: Thursday, April 04, 2019 5:13 PM
To: Fugh, Justina <Fugh.Justina@epa.gov>
Subject: RE: Your ethics filing obligations

Thanks for the call and for answering all of my questions. As I continue working through this reporting, I've come up with a few more:

4. (b) (6)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

(b) [REDACTED]

[REDACTED]

(b) [REDACTED]

[REDACTED]

[REDACTED]

Thanks!

Taylor Hoverman
Policy Counsel to the Assistant Administrator
Office of Land and Emergency Management
U.S. Environmental Protection Agency
O: 202-566-2705
C: (b) (6)

From: Fugh, Justina
Sent: Monday, March 11, 2019 12:52 PM
To: Hoverman, Taylor <hoverman.taylor@epa.gov>
Subject: Your ethics filing obligations

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- But if you (not your spouse) have any earned income (e.g., outside job, paid pension), you have to report the actual amount of that income.
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Cheers,

Justina

Justina Fugh | Director, Ethics Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: [Duross, Jeanne](#)
To: [OGC Ethics](#)
Subject: FW: A follow-up question
Date: Wednesday, February 27, 2019 9:20:04 AM
Attachments: [image001.png](#)

(b) (5)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Ethics Attorney | Office of General Counsel | US EPA | Mail Code 2311A | Room 4407F North,
William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use
20004 for the zip code) | phone 202-564-6595| epa mobile 202-579-7848|fax 202-564-1772

From: Hoverman, Taylor
Sent: Tuesday, February 26, 2019 4:25 PM
To: Duross, Jeanne <Duross.Jeanne@epa.gov>
Subject: RE: A follow-up question

FYI – here is the link describing the networking event at Hogan Lovells I asked about:

<https://www.eli.org/events/dc-energy-environment-associations-reception>

Taylor Hoverman

Policy Counsel to the Assistant Administrator
Office of Land and Emergency Management (OLEM)
United States Environmental Protection Agency
1301 Constitution Ave, NW
Washington, DC 20004
202-566-2705

From: Hoverman, Taylor
Sent: Tuesday, February 26, 2019 9:29 AM
To: Duross, Jeanne <Duross.Jeanne@epa.gov>
Subject: RE: A follow-up question

OK – Thank you, Jeanne!

Taylor Hoverman

Policy Counsel to the Assistant Administrator
Office of Land and Emergency Management (OLEM)

United States Environmental Protection Agency
1301 Constitution Ave, NW
Washington, DC 20004
202-566-2705

From: Duross, Jeanne
Sent: Tuesday, February 26, 2019 9:28 AM
To: Hoverman, Taylor <hoverman.taylor@epa.gov>
Subject: FW: A follow-up question

Hi Taylor,

So as to not leave you hanging out there in the interim, here's a little bit more that we can say by way of guidance.

Regarding the specifics of the questions below, you can't speak in your official capacity at a conference sponsored (or co-sponsored) by your former employer.

OGC/Ethics would really need to know more about the specifics of other types of meetings before giving you correct answers and advice. Whether you can attend consistent with your Trump pledge obligations depends on the subject matter of the meeting and how many other attendees are present. An appointee may be permitted by OGC/Ethics to attend a meeting at which her former employer participates provided: OGC/Ethics first determines that the subject matter is a particular matter of general applicability; that there are more than 4 other individuals with no other recusal issues for the appointee in attendance; and the attendees represent a diversity of viewpoints.

When the former employer is the trade association, the question regarding a diversity of viewpoints needs to be evaluated on a case by case basis. It's a harder question than some other fact patterns present.

Hope this is helpful. As I mentioned, I'll be in touch again after our staff meeting.

Best,

Jeanne

Ethics Attorney | Office of General Counsel | US EPA | Mail Code 2311A | Room 4407F North,
William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use
20004 for the zip code) | phone 202-564-6595| epa mobile 202-579-7848|fax 202-564-1772

From: Duross, Jeanne
Sent: Tuesday, February 26, 2019 9:22 AM
To: Hoverman, Taylor <hoverman.taylor@epa.gov>
Subject: RE: A follow-up question

Hi Taylor,

The answer regarding whether you may attend something is always going to be highly fact-specific in every instance. The best advice is to contact OGC/Ethics any and every time that you are contemplating any work or invitation that involves AFPM.

We have a staff meeting today and I am going to raise your question. I'll be in touch with any more specific guidelines that I can share and/or a request for you to meet with us briefly. Stay tuned.

-Jeanne

Ethics Attorney | Office of General Counsel | US EPA | Mail Code 2311A | Room 4407F North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-6595 | epa mobile 202-579-7848 | fax 202-564-1772

From: Hoverman, Taylor
Sent: Monday, February 25, 2019 12:17 PM
To: Duross, Jeanne <Duross.Jeanne@epa.gov>
Subject: RE: A follow-up question

Jeanne,

Thank you. Does this mean I'm unable to attend any of AFPM's conferences or committee meetings as a speaker or any meetings that they schedule with the Agency on rulemakings? Just making sure I understand all of the restrictions. Thanks!

Taylor Hoverman

Policy Counsel to the Assistant Administrator
Office of Land and Emergency Management (OLEM)
United States Environmental Protection Agency
1301 Constitution Ave, NW
Washington, DC 20004
202-566-2705

From: Duross, Jeanne
Sent: Monday, February 25, 2019 12:13 PM
To: Hoverman, Taylor <hoverman.taylor@epa.gov>
Subject: Re: A follow-up question

Hi Taylor,

Thanks so much for following up with this question. I ran it by Justina and Shannon to ensure that the advice given would be consistent with that given other similarly situated political appointees who signed the Pledge.


Here are the rules:

Unfortunately, because AFPM, your former employer, set up the meeting, you can't go at all. The specific party matter in which you cannot participate under the pledge is the invitation by the former employer for their meeting. For this specific party matter, it doesn't matter how many parties are invited or attending. What is significant is that it is AFPM's meeting. In addition, you also cannot participate in deciding whether Steven Cook should go or provide help with his presentation materials.

Please let me know if you have questions. We're very happy you spotted the issue and reached out for assistance.

Best,

Jeanne

Jeanne M. Duross/ Ethics Attorney/Office of General Counsel, Ethics/U.S.
EPA/4407F--WJCN (Mail Code 2248A)/Phone (202)564-6595 

From: Hoverman, Taylor
Sent: Friday, February 22, 2019 3:18 PM
To: Duross, Jeanne
Subject: A follow-up question

Jeanne,

Thank you for meeting with me yesterday and walking through all of my specific ethics questions. I already have a follow-up question –

AFPM has invited Steven Cook to speak at a meeting in March and was interested in having me accompany him. There will be at least a dozen companies in the room in addition to AFPM staff. Is it permissible for me to attend since there are at least five (I think that's the threshold number) other companies in the room? Coming from a trade association, it's not clear to me whether the trade association's member companies count towards the threshold of having other companies present.

I also want to confirm that Shannon is planning to reach out to me to discuss potential recusals?

Thanks!

Taylor Hoverman



Policy Counsel to the Assistant Administrator

Office of Land and Emergency Management (OLEM)

United States Environmental Protection Agency

1301 Constitution Ave, NW

Washington, DC 20004

202-566-2705  

From: [Griffo, Shannon](#)
To: [Fugh, Justina](#)
Subject: Taylor Hoverman recusal statement
Date: Tuesday, June 11, 2019 4:16:14 PM
Attachments: [Taylor Hoverman Recusal Statement Signed.pdf](#)

And here is Taylor's signed recusal statement.

Thanks,
Shannon

Shannon Griffo
Ethics Attorney
Office of General Counsel, Ethics
U.S. Environmental Protection Agency
(202) 564-7061
Griffo.Shannon@epa.gov



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
SOLID WASTE AND
EMERGENCY RESPONSE

NOW THE
OFFICE OF LAND AND
EMERGENCY MANAGEMENT

MEMORANDUM

SUBJECT: Recusal Statement

FROM: Taylor Hoverman
Policy Counsel

Taylor Hoverman
06/05/19

TO: Barry Breen
Acting Assistant Administrator

I have previously consulted with the Office of General Counsel/Ethics (OGC/Ethics) and been advised about my ethics obligations. This memorandum formally notifies you of my continuing obligation to recuse myself from participating personally and substantially in certain matters in which I have a financial interest, or a personal or business relationship. I also understand that I have obligations pursuant to Executive Order 13770 and the Trump Ethics Pledge that I signed, as well as my own attorney bar obligations.

FINANCIAL CONFLICTS OF INTEREST

As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter in which I know that I have a financial interest directly and predictably affected by the matter, or in which I know that a person whose interests are imputed to me has a financial interest directly and predictably affected by the matter, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). I understand that the interests of the following persons are imputed to me: any spouse or minor child of mine; any general partner of a partnership in which I am a limited or general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

I have consulted with OGC/Ethics and been advised that I do not currently have any significant financial conflicts of interest but will remain vigilant and notify OGC/Ethics immediately should my financial situation change.

OBLIGATIONS UNDER EXECUTIVE ORDER 13770

Pursuant to Section 1, Paragraph 6 of the Executive Order, I understand that I am prohibited from participating in any particular matter involving specific parties in which my former employer, **American Fuel & Petrochemical Manufacturers**, is a party or represents a

party. Under the terms of the Ethics Pledge, I understand that my recusal lasts until February 12, 2021, which is two years from the date that I joined federal service.

I have been advised by OGC/Ethics that, for the purposes of this pledge obligation, the term “particular matters involving specific parties” is broadened to include any meetings or other communication relating to the performance of my official duties, unless the communication applies to a particular matter of general applicability and participation in the meeting or other event is open to all interested parties. I am further advised that the term “open to all interested parties” means that the meeting should include a multiplicity of parties representing a diversity of viewpoints. If my former employer is present, then I understand that, generally speaking, at least four other parties should be present to ensure that a diversity of viewpoints is represented and not the same united perspective.

ATTORNEY BAR OBLIGATIONS

Pursuant to my obligations under my bar rules, I recognize that I am obliged to protect the confidences of my former clients. I also understand that I cannot participate in any matter that is the same as or substantially related to the same specific party matter that I participated in personally and substantially while in private practice, unless my bar provides for and I first obtain informed consent and notify OGC/Ethics.

SCREENING ARRANGEMENT

In order to ensure that I do not participate in matters relating to the entity listed above, I will instruct Nick Hilosky or Becky Brooks, to assist in screening EPA matters directed to my attention that involve American Fuel & Petrochemical Manufacturers. All inquiries and comments involving this entity should be directed to Nick Hilosky or Becky Brooks without my knowledge or involvement.

If Nick Hilosky or Becky Brooks determine that a particular matter will directly involve my former employer, then he/she will refer it for action or assignment to another, without my knowledge or involvement. In the event that he/she is unsure whether an issue is a particular matter from which I am recused, then he/she will consult with OGC/Ethics for a determination. I will provide a copy of this memorandum to Justina Fugh, Director, Ethics Office.

UPDATE AS NECESSARY

In consultation with OGC/Ethics, I will revise and update my recusal statement whenever warranted by changed circumstances, including changes in my financial interests, changes in my personal or business relationships, or any changes to my EPA duties. In the event of any changes to my screening arrangement, I will provide a copy of the revised recusal statement to you and OGC/Ethics.

cc: Steven Cook, Deputy Assistant Administrator
Justina Fugh, Director, Ethics Office

From: [Fugh, Justina](#)
To: [Hoverman, Taylor](#)
Subject: Your ethics filing obligations
Date: Monday, March 11, 2019 12:52:00 PM
Attachments: [Hatch Act chart February 2017.docx](#)
[Distinctions between Reporting Transactions on the OGE 278 - January 201... .docx](#)

Hi there,

Welcome to the wonderful world of public financial disclosure reporting! You recently started as an attorney-adviser in OLEM in a Schedule C position. Congratulations! You are required by the Ethics in Government Act of 1978 to file the Public Financial Disclosure Report because you are in this type of position. Your "new entrant" report is due no later than 30 days from your effective date, which was 2/12/19, but we will set your due date 30 days from now. Your report will be due 4/10/19.

EPA uses an entirely electronic filing system (called INTEGRITY) for the public financial disclosure reports. This system is operated and secured by the Office of Government Ethics. You are required by law to complete the form, and we will use it to determine whether you have any financial conflicts of interest or other ethics concerns. There are several important things to know about the OGE-278e: (1) it is a public form (which means that anyone can ask for a copy of your form, but Congress repealed the requirement for public posting to the internet); (2) you have to fill it out every year you are in this position; (3) when you leave, you will have to file a termination report (we'll remind you); and (4) you will be subject to a late filing fee of \$200 for not filing your report timely. Plus, there are also civil and criminal penalties for failure to file at all or for inaccurate reporting.

THE FINANCIAL DISCLOSURE REPORT, OGE-278e

We created an account for you in INTEGRITY and have assigned you a "new entrant" report. If you are asked to provide an address, use the EPA business address. Do not enter your personal home address. Your filer category is "Schedule C." For help in INTEGRITY, check out the information on the OGC/Ethics website at <http://intranet.epa.gov/ogc/integrity/Landingpage.html>. The email from INTEGRITY.gov will provide you with specific instructions to log into the federal government's max.gov site, the gateway to INTEGRITY. If you don't receive your account notification within three days, then please check your clutter box for messages from INTEGRITY.gov, or contact ethics@epa.gov so that we can follow up.

DEADLINE FOR SUBMITTING THE FORM

INTEGRITY will give you 30 days to complete the form. If you need additional time, you must contact me directly. There is a limit to how much additional time we can give you before late fees kick in, so please pay attention to this requirement.

HELPFUL HINTS FOR FILLING OUT THE FORM

- This is a wretched and exacting form, so just know that you will have to report way more information that you did on the confidential financial disclosure report.
- You will get three different places to report assets: filer's employment-related assets and income, spouse's employment related assets and income, and other assets and

income. So you are reporting the assets for yourself, your spouse and your dependent children. We don't really care where you report your assets, just that you do report them all someplace.

- You must include any investment asset that is worth more than \$1000. Include any income from any source that exceeded \$200 during the reporting period (including outside jobs or hobbies, rental income). Include any cash/savings accounts that have more than \$5000.
- Enter each asset separately. Don't lump items together on one line. Be sure to provide the valuation of the asset AND the amount of the income. For assets that aren't mutual funds, you also have to report the type of income (e.g., dividends, cap gains).
- For 401(k) or IRA plans, provide the name of each of the underlying assets. Don't just write "Vanguard IRA" or "mutual fund." You must specify each asset separately and give the valuation.
- Do not report your federal salary, your spouse's federal salary, or TSP
- But if you (not your spouse) have any earned income (e.g., outside job, paid pension), you have to report the actual amount of that income.
- But if your spouse works outside of federal service, then include your spouse's employer but not the amount of your spouse's salary. If you are not legally married, do not report your significant other's employer.
- Don't forget to include any life insurance policies (whole life or variable life) as well as the underlying investments, but do not report term life insurance.
- If you have nothing to report in a section, be sure to click the "nothing to report" button

OTHER ETHICS REQUIREMENTS FOR YOU

STOCK ACT

Because you are required to file the form, you are also now subject to the STOCK Act. You are required to report any purchase, sale or exchange of stocks, bonds, commodities futures or other forms of securities when the amount of the transaction exceeds \$1000. Use INTEGRITY to disclose reportable transactions within 30 days of receiving notification of the transaction, but not later than 45 days after the transaction occurs. You will have to report transactions that occur within brokerage accounts, managed accounts, or other investment vehicles that you own or jointly own with your spouse or another person, as well as transactions of your spouse or dependent children. For a comprehensive review of reportable transactions, see EPA Ethics Advisory 2012-03 at http://intranet.epa.gov/ogc/ethics/Ethics_Advisory_2012-03.pdf and our revised chart, also attached.

HATCH ACT

You are “lesser restricted” under the Hatch Act. During your new employee orientation, the ethics staff went over the Hatch Act, which governs the political activity of government employees. For a refresher, you can familiarize yourself with the Hatch Act as it affects you by reviewing our online [Hatch Act training course](#) or check out our attached handy chart that reminds you of your restrictions.

ETHICS TRAINING

The new employee training you had with Jeanne Duross meets your annual training requirement for 2019. Next year, you’ll need to take annual training online. Don’t worry. We’ll let you know and remind you!

Cheers,

Justina

Justina Fugh | Director, Ethics Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

When to Report Transactions

This table's guidance is effective beginning January 1, 2013 and for informational purposes only. Email ethics@epa.gov for specific questions.

	Periodic Transaction Report	Annual and/or Termination Report
Investment Assets	Report on the OGE 278-T?	Report on the OGE 278?
Transactions of \$1,000 or less		
• Any asset in which the transaction amount is \$1,000 or less regardless of the type of asset or who owns the asset	No	No
Your investment assets (or jointly held)		
• Your stocks	Yes	Yes
• Your bonds (except U.S. Treasury securities)	Yes	Yes
• Your commodity futures	Yes	Yes
• Your other investment securities	Yes	Yes
• Assets listed above in your (joint) brokerage accounts, (joint) managed accounts, IRAs, other retirement accounts, and/or other (joint) investment vehicles	Yes	Yes
Your spouse's investment assets		
• Spouse's stocks	Yes	Yes
• Spouse's bonds (except U.S. Treasury securities)	Yes	Yes
• Spouse's commodity futures	Yes	Yes
• Spouse's other investment securities	Yes	Yes
• Assets listed above in spouse's <u>own</u> brokerage account, managed accounts, IRAs, other retirement accounts, and/or other investment vehicles	Yes	Yes
Your dependent child's investment assets		
• Dependent child's stocks	Yes	Yes
• Dependent child's bonds (except U.S. Treasury securities)	Yes	Yes
• Dependent child's commodity futures	Yes	Yes
• Dependent child's other investment securities	Yes	Yes
• Assets listed above in dependent child's <u>own</u> brokerage account, IRAs, and/or other investment vehicles	Yes	Yes
Other investment assets irrespective of ownership		
• Real Property	No	Yes ¹
• Mutual funds, exchange traded funds, index funds and/or other "excepted investment funds" ²	No	Yes
• Any asset in which the transaction amount is \$1,000 or less	No	No
• Cash accounts (deposits and/or withdrawals)	No	No
• Money market accounts	No	No
• Money market funds	No	No
• Certificates of deposits	No	No
• US Treasury Securities (e.g., T bills, Treasury bonds, U.S. savings bonds)	No	No
• Federal Government Retirement Accounts (e.g., Thrift Savings Plan)	No	No
• Life insurance and annuities	No	No
• Collectibles	No	No
• Assets held within an excepted trust ³	No	No
• Transfer of assets between you, your spouse, and your dependent children	No	No

¹ You do not report the purchase or sale of your personal residence on Schedule B unless you rent it out at any time during the reporting period.

² To be an excepted investment fund (EIF), the asset must be:

- (a) widely held (more than 100 participants),
- (b) independently managed – arranged so that you neither exercise control nor have the ability to exercise control over the financial interests held by the fund, and
- (c) publicly traded (or available) or widely diversified.

There are several types of investment vehicles that are not excepted investment funds, including (but not limited to) managed accounts, investment clubs, trusts, 529 accounts, brokerage accounts, and individual retirement accounts (IRAs). You should note that the individual assets held within these types of investment vehicles may qualify as EIFs if, for example, your IRA holds a publicly-traded mutual fund. If you have questions about whether a particular asset or investment vehicle is an EIF, contact ethics@epa.gov.

³ OGC/Ethics must determine that your trust qualifies as an “excepted trust.” For help, email ethics@epa.gov.

Political Activities and Federal Employees

The Hatch Act, enacted in 1939, was amended in 1993 and 2012. It regulates the political activities of executive branch employees, excluding the President and Vice President. The following table summarizes what political activities EPA employees can and cannot do based on their appointment. Note: Public Health Service officers must adhere to 45 CFR Part 73, Subpart F, which is most similar to the Career SES/ALJ column.

Political activity means an activity “directed toward the success or failure of a political party, a candidate for partisan political office, or a partisan political group.”

Type of Activity	PAS*	Non-Career SES, Schedule C*, Title 42, SL/ST, AD*, GS, Other	Career SES, ALJs
Personal (off premises and off duty)			
Express support for or opposition to a political candidate when off duty	Yes	Yes	Yes
Run as a partisan candidate for nomination or office in a partisan election	No	No	No
Solicit and accept contributions for your campaign in a non-partisan election	Yes	Yes	Yes
Solicit a contribution from a member of your union	N/A	Yes	N/A
Work a phone bank asking individuals to volunteer	Yes	Yes	No
Campaign on behalf of a candidate in a partisan election	Yes	Yes	No
Be active on behalf of a candidate at political rallies or meetings	Yes	Yes	No
Attend political rallies and meetings	Yes	Yes	Yes
Contribute money to political organizations	Yes	Yes	Yes
Work in non-partisan voter registration drives	Yes	Yes	Yes
Work in partisan voter registration drives	Yes	Yes	No
Register and vote	Yes	Yes	Yes
Sign a nominating petition	Yes	Yes	Yes
Distribute campaign material in a partisan election	Yes	Yes	No
Work as an election judge, poll watcher, clerical worker on election day	Yes	Yes	Yes
Drive people to polling station on behalf of a campaign	Yes	Yes	No
Affecting Official Resources			
Use office time for political activity	Yes; IG-No	No	No
Use official space for political activity in general	Yes; IG-No	No	No
Fundraising			
Attend a political fundraiser	Yes	Yes	Yes
Solicit, accept or receive political contributions in general	No	No	No
Solicit or receive a political contribution on government premises	No	No	No
Plan or organize a political fundraiser when off duty	Yes	Yes	No
Sponsor, host, or allow your name as sponsor/host for a political fundraiser	No	No	No
Serve drinks or check coats at a political fundraiser	Yes	Yes	No
Speak at a partisan fundraiser without appealing for money	Yes	Yes	No
Allow only your name to be listed as speaker on fundraising invitation	Yes	Yes	No

*PAS = Political Appointee Confirmed by the Senate; Schedule C = political appointees not confirmed by Senate; AD = Administratively Determined; SES = Senior Executive Service

From: [Keith, Jennie](#)
To: [Duross, Jeanne](#)
Subject: RE: hoverman.taylor, you have an invitation from AFPM!
Date: Monday, May 13, 2019 12:29:00 PM

She didn't reach out to me! FYI

From: Duross, Jeanne
Sent: Monday, May 13, 2019 10:00 AM
To: Hoverman, Taylor <hoverman.taylor@epa.gov>
Cc: Keith, Jennie <Keith.Jennie@epa.gov>
Subject: RE: hoverman.taylor, you have an invitation from AFPM!

Hi Taylor,

I just saw your email this morning (I don't work on Fridays). I'm unsure whether you sought counsel from anyone else in OGC/Ethics when you didn't hear from me. I'm cc'ing Jennie Keith, who is our invitations expert here.

Since your former employer is a registered lobbyist and the event is a gift, you can't accept it, even in your personal capacity. That doesn't mean that you can't attend in your personal capacity, just that you would have to pay to attend so that there is no gift.

If you attended the event, we will need to reach out to AFPM to determine the cost of your attendance so that you can write them a check to cover the cost of your attendance.

-Jeanne

[Ethics Attorney | Office of General Counsel | US EPA | Mail Code 2311A | Room 6011A North, William Jefferson Clinton Federal Building | Washington, DC 20460 \(for ground deliveries, use 20004 for the zip code\) | phone 202-564-6595| epa mobile 202-579-7848|fax 202-564-1772](#)

From: Hoverman, Taylor
Sent: Thursday, May 09, 2019 5:37 PM
To: Duross, Jeanne <Duross.Jeanne@epa.gov>
Subject: FW: hoverman.taylor, you have an invitation from AFPM!

Am I able to attend a farewell party for my former co-worker? While I would attend in my personal capacity, the invite came from AFPM to my work email, so I want to avoid doing anything that would give the appearance of impropriety. Thank you!

Taylor Hoverman

Policy Counsel to the Assistant Administrator
Office of Land and Emergency Management
U.S. Environmental Protection Agency

O: 202-566-2705

C: (b) (6)

From: AFPM <evite@mailva.evite.com>
Sent: Thursday, May 9, 2019 5:32 PM
To: Hoverman, Taylor <hoverman.taylor@epa.gov>
Subject: hoverman.taylor, you have an invitation from AFPM!



You're Invited

DAN STRACHAN!

[View Your invitation](#)



AFPM sent you an invitation.

[RSVP Now!](#) [View invitation](#)

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This email was sent to hoverman.taylor@epa.gov

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ETHICS PLEDGE

As a condition, and in consideration, of my employment in the United States Government in an appointee position invested with the public trust, I commit myself to the following obligations, which I understand are binding on me and are enforceable under law:

1. I will not, within 5 years after the termination of my employment as an appointee in any executive agency in which I am appointed to serve, engage in lobbying activities with respect to that agency.
2. If, upon my departure from the Government, I am covered by the post-employment restrictions on communicating with employees of my former executive agency set forth in section 207(c) of title 18, United States Code, I agree that I will abide by those restrictions.
3. In addition to abiding by the limitations of paragraphs 1 and 2, I also agree, upon leaving Government service, not to engage in lobbying activities with respect to any covered executive branch official or non-career Senior Executive Service appointee for the remainder of the Administration.
4. I will not, at any time after the termination of my employment in the United States Government, engage in any activity on behalf of any foreign government or foreign political party which, were it undertaken on January 20, 2017, would require me to register under the Foreign Agents Registration Act of 1938, as amended.
5. I will not accept gifts from registered lobbyists or lobbying organizations for the duration of my service as an appointee.
6. I will not for a period of 2 years from the date of my appointment participate in any particular matter involving specific parties that is directly and substantially related to my former employer or former clients, including regulations and contracts.
7. If I was a registered lobbyist within the 2 years before the date of my appointment, in addition to abiding by the limitations of paragraph 6, I will not for a period of 2 years after the date of my appointment participate in any particular matter on which I lobbied within the 2 years before the date of my appointment or participate in the specific issue area in which that particular matter falls.
8. I agree that any hiring or other employment decisions I make will be based on the candidate's qualifications, competence, and experience.
9. I acknowledge that the Executive Order entitled "Ethics Commitments by Executive Branch Appointees," issued by the President on January 28, 2017, which I have read before signing this document, defines certain terms applicable to the foregoing obligations and sets forth the methods for enforcing them. I expressly accept the provisions of that Executive Order as a part of this agreement and as binding on me. I understand that the obligations of this pledge are in addition to any statutory or other legal restrictions applicable to me by virtue of Government service.

Taylor Hoverman
Signature

February 19, 2019
Date

Hoverman, Taylor, Danielle
Print or type your full name (last, first, middle)

Message

From: Hoverman, Taylor [hoverman.taylor@epa.gov]
Sent: 4/4/2019 9:19:19 PM
To: Duross, Jeanne [Duross.Jeanne@epa.gov]
Subject: RE: **Personal Matters / Ex. 6**

Jeanne,

I just wanted to follow up on this and let you know that **Personal Matters / Ex. 6**
Personal Matters / Ex. 6

Taylor Hoverman
Policy Counsel to the Assistant Administrator
Office of Land and Emergency Management
U.S. Environmental Protection Agency
O: 202-566-2705
C: (b) (6)

From: Hoverman, Taylor
Sent: Thursday, March 28, 2019 2:25 PM
To: Duross, Jeanne <Duross.Jeanne@epa.gov>
Subject: FW: **Personal Matters / Ex. 6**

Personal Matters / Ex. 6

Taylor Hoverman
Policy Counsel to the Assistant Administrator
Office of Land and Emergency Management
U.S. Environmental Protection Agency
O: 202-566-2705
C: (b) (6)

From: Taylor Hoverman **Personal Email / Ex. 6**
Sent: Thursday, March 28, 2019 2:23 PM
To: Hoverman, Taylor <hoverman.taylor@epa.gov>
Subject: **Personal Matters / Ex. 6**

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Message

From: Hoverman, Taylor [hoverman.taylor@epa.gov]
Sent: 4/8/2019 2:15:52 PM
To: Duross, Jeanne [Duross.Jeanne@epa.gov]
Subject: RE: Personal Matters / Ex. 6

Thanks so much!

Taylor Hoverman
Policy Counsel to the Assistant Administrator
Office of Land and Emergency Management
U.S. Environmental Protection Agency
O: 202-566-2705
C: (b) (6)

From: Duross, Jeanne
Sent: Monday, April 8, 2019 10:03 AM
To: Hoverman, Taylor <hoverman.taylor@epa.gov>
Subject: RE: Personal Matters / Ex. 6

Thanks for closing the loop. We can confirm then that there are no Ethics Pledge (gift ban) issues associated with this partnership.

-Jeanne

Ethics Attorney | Office of General Counsel | US EPA | Mail Code 2311A | Room 44013 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-6595 | epa mobile 202-579-7848 | fax 202-564-1772

From: Hoverman, Taylor
Sent: Thursday, April 04, 2019 5:19 PM
To: Duross, Jeanne <Duross.Jeanne@epa.gov>
Subject: RE: Personal Matters / Ex. 6

Jeanne,

I just wanted to follow up on this and let you know that Personal Matters / Ex. 6

Personal Matters / Ex. 6

Taylor Hoverman
Policy Counsel to the Assistant Administrator
Office of Land and Emergency Management
U.S. Environmental Protection Agency
O: 202-566-2705
C: (b) (6)

From: Hoverman, Taylor
Sent: Thursday, March 28, 2019 2:25 PM
To: Duross, Jeanne <Duross.Jeanne@epa.gov>
Subject: FW: Personal Matters / Ex. 6

Personal Matters / Ex. 6

Taylor Hoverman
Policy Counsel to the Assistant Administrator
Office of Land and Emergency Management
U.S. Environmental Protection Agency
O: 202-566-2705
C: (b) (6)

From: Taylor Hoverman <Personal Email / Ex. 6>
Sent: Thursday, March 28, 2019 2:23 PM
To: Hoverman, Taylor <hoverman.taylor@epa.gov>
Subject: Personal Matters / Ex. 6

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Message

From: Hoverman, Taylor [hoverman.taylor@epa.gov]
Sent: 3/28/2019 6:24:43 PM
To: Duross, Jeanne [Duross, Jeanne@epa.gov]
Subject: FW: Personal Matters / Ex. 6
Attachments: Personal Matters / Ex. 6

Personal Matters / Ex. 6

Taylor Hoverman
Policy Counsel to the Assistant Administrator
Office of Land and Emergency Management
U.S. Environmental Protection Agency
O: 202-566-2705
C: (b) (6)

From: Taylor Hoverman **Personal Email / Ex. 6**
Sent: Thursday, March 28, 2019 2:23 PM
To: Hoverman, Taylor <hoverman.taylor@epa.gov>
Subject: Personal Matters / Ex. 6

Get [Outlook for iOS](#)

Message

From: Duross, Jeanne [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=1771DDAF869F40998535D410E5B1A93E-JDUROSS]
Sent: 4/8/2019 2:02:57 PM
To: Hoverman, Taylor [hoverman.taylor@epa.gov]
Subject: RE: **Personal Matters / Ex. 6**

Thanks for closing the loop. We can confirm then that there are no Ethics Pledge (gift ban) issues associated with this partnership.

-Jeanne

Ethics Attorney | Office of General Counsel | US EPA | Mail Code 2311A | Room 44013 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-6595 | epa mobile 202-579-7848 | fax 202-564-1772

From: Hoverman, Taylor
Sent: Thursday, April 04, 2019 5:19 PM
To: Duross, Jeanne <Duross.Jeanne@epa.gov>
Subject: RE: **Personal Matters / Ex. 6**

Jeanne,

I just wanted to follow up on this and let you know that **Personal Matters / Ex. 6**

Personal Matters / Ex. 6

Taylor Hoverman
Policy Counsel to the Assistant Administrator
Office of Land and Emergency Management
U.S. Environmental Protection Agency
O: 202-566-2705
C: (b) (6)

From: Hoverman, Taylor
Sent: Thursday, March 28, 2019 2:25 PM
To: Duross, Jeanne <Duross.Jeanne@epa.gov>
Subject: FW: **Personal Matters / Ex. 6**

Personal Matters / Ex. 6

Taylor Hoverman
Policy Counsel to the Assistant Administrator
Office of Land and Emergency Management
U.S. Environmental Protection Agency
O: 202-566-2705
C: (b) (6)

From: Taylor Hoverman <**Personal Email / Ex. 6**>
Sent: Thursday, March 28, 2019 2:23 PM

To: Hoverman, Taylor <hoverman.taylor@epa.gov>

Subject: Personal Matters / Ex. 6

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Message

From: Duross, Jeanne [Duross.Jeanne@epa.gov]
Sent: 3/29/2019 2:16:16 PM
To: Fugh, Justina [Fugh.Justina@epa.gov]
Subject: Fw: Personal Matters / Ex. 6
Attachments: **Personal Matters / Ex. 6**

Jeanne M. Duross/ Ethics Attorney/Office of General Counsel, Ethics/U.S. EPA/4407F--
WJCN (Mail Code 2248A)/Phone (202)564-6595

From: Hoverman, Taylor
Sent: Thursday, March 28, 2019 2:24 PM
To: Duross, Jeanne
Subject: FW: Personal Matters / Ex. 6

Personal Matters / Ex. 6

Taylor Hoverman
Policy Counsel to the Assistant Administrator
Office of Land and Emergency Management
U.S. Environmental Protection Agency
O: 202-566-2705
C: (b) (6)

From: Taylor Hoverman <Personal Email / Ex. 6>
Sent: Thursday, March 28, 2019 2:23 PM
To: Hoverman, Taylor <hoverman.taylor@epa.gov>
Subject: Personal Matters / Ex. 6

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From: Taylor Hoverman **Personal Email / Ex. 6**
Sent: 3/28/2019 6:22:40 PM
To: Hoverman, Taylor [hoverman.taylor@epa.gov]
Subject: **Personal Matters / Ex. 6**
Attachments: **Personal Matters / Ex. 6**

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